

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

OLUWASEUN ADEKOYA, a/k/a "Ace G.," a/k/a "BRODA," a/k/a "SANTA," a/k/a "SANTANA," a/k/a "Sammy LaBanco," a/k/a "Sean Maison," a/k/a "Kiing_maison,"

KANI BASSIE, a/k/a "\$,"

JERMON BROOKS, a/k/a "JayB," a/k/a "beezy,"

CHRISTIAN QUIVERS, a/k/a "Denzel Carter," a/k/a "E,"

and

CRYSTAL KURSCHNER,

Defendants.

) Criminal No. 1:23-CR-491 (MAD)
)
) **Second Superseding Indictment**
)
) Violations: 18 U.S.C. §§1349, 1344
) [Bank Fraud Conspiracy]
) 18 U.S.C. § 1956(h)
) [Money Laundering
) Conspiracy]
) 18 U.S.C. § 1028A
) [Aggravated Identity Theft]
)
) 11 Counts & Forfeiture Allegations
)
)
) Counties of Albany, Broome,
) Offenses: Clinton, Rensselaer, and
) Saratoga

THE GRAND JURY CHARGES:**COUNT 1**
[Conspiracy to Commit Bank Fraud]**The Conspiracy**

- From in or about November 2021 through on or about December 12, 2023, in Albany, Broome, Clinton, Rensselaer, and Saratoga Counties in the Northern District of New York, and elsewhere, the defendants, **OLUWASEUN ADEKOYA, a/k/a "Ace G.," a/k/a "BRODA," a/k/a "SANTA," a/k/a "SANTANA," a/k/a "Sammy LaBanco," a/k/a "Sean Maison," a/k/a "Kiing_maison," KANI BASSIE, a/k/a "\$," JERMON BROOKS, a/k/a**

“**JayB**,” a/k/a “**beezy**,” **CHRISTIAN QUIVERS**, a/k/a “**Denzel Carter**,” a/k/a “**E**,” **CRYSTAL KURSCHNER**, and others known and unknown conspired to commit bank fraud by knowingly executing and attempting to execute a scheme and artifice to defraud financial institutions, and to obtain monies, funds, and assets owned by, and under the custody and control of, financial institutions, by means of false and fraudulent pretenses and representations, in violation of Title 18, United States Code, Section 1344(1) and (2).

Object of the Conspiracy

2. The object of the conspiracy was to defraud financial institutions throughout the United States by using stolen identities to fraudulently obtain cash, checks, loans, and credit.

Manner and Means

3. **ADEKOYA** and other coconspirators obtained personally identifiable information, or “**PII**,” of people living throughout the United States, including the people’s names, dates of birth, Social Security numbers, and the names of banks and credit unions where the identity-theft victims held accounts.

4. The **PII** was provided to other members of the conspiracy, including **BASSIE**, **BROOKS**, **QUIVERS**, and **KURSCHNER**, to use in conducting and attempting to conduct false and fraudulent transactions at banks, credit unions, and using credit cards issued by banks, including:

- a. withdrawing cash from and obtaining checks drawn against accounts held by identity-theft victims at banks and credit unions;
- b. applying for and obtaining loans from banks and credit unions in the names of identity-theft victims and stealing the loan proceeds;

- c. opening accounts in the names of identity-theft victims at banks and credit unions and using the accounts to receive fraud proceeds and to deposit stolen checks; and
- d. using credit cards issued by banks in the identify-theft victims' names to purchase merchandise.

5. **ADEKOYA, BASSIE, BROOKS, QUIVERS**, and other coconspirators provided other members of the conspiracy, including **KURSCHNER**, with fake driver's licenses in the identity-theft victims' names and instructed **KURSCHNER** and other members of the conspiracy how to conduct and attempt to conduct the fraudulent transactions.

6. **KURSCHNER** and other members of the conspiracy then used the fake driver's licenses, which bore their photographs, to conduct and attempt to conduct the fraudulent transactions.

7. In conducting and attempting to conduct the fraudulent transactions, **KURSCHNER** and other coconspirators impersonating identity-theft victims were often accompanied to financial institutions by other members of the conspiracy, including **ADEKOYA, BASSIE, BROOKS**, and **QUIVERS**, who communicated with the members of conspiracy impersonating identity-theft victims by telephone as they conducted and attempted to conduct the fraudulent transactions.

8. **ADEKOYA, BASSIE, BROOKS**, and other coconspirators paid **KURSCHNER** and other conspirators conducting and attempting to conduct the fraudulent transactions a small portion of the fraud proceeds in exchange for conducting the fraudulent transactions.

9. In the course of the conspiracy, the defendants were collectively involved in hundreds of fraudulent transactions at financial institutions in the Northern District of New York and all over the country, with losses exceeding \$1.5 million.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2
[Money Laundering Conspiracy]

10. Paragraphs 1 through 9 are hereby realleged and incorporated by reference as if fully set forth herein.

11. From in or about November 2021 through on or about December 12, 2023, in Albany and Broome Counties in the Northern District of New York, and elsewhere, the defendants, **OLUWASEUN ADEKOYA, a/k/a “Ace G.,” a/k/a “BRODA,” a/k/a “SANTA,” a/k/a “SANTANA,” a/k/a “Sammy LaBanco,” a/k/a “Sean Maison,” a/k/a “Kiing_maison,” KANI BASSIE, a/k/a “\$,”** and others known and unknown conspired to commit the following offenses:

a. **Promotional Money Laundering**, by knowing that the property involved in one or more financial transactions represented the proceeds of some form of unlawful activity, conducting and attempting to conduct such a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, that is, bank fraud, in violation of 18 U.S.C. § 1344, with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i);

b. **Concealment Money Laundering**, by knowing that the property involved in one or more financial transactions represented the proceeds of some form of unlawful activity, conducting and attempting to conduct such a financial transaction affecting interstate commerce, which transaction involved the proceeds of specified unlawful activity, that is, bank fraud, in violation of 18 U.S.C. § 1344, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and

c. **Transactions in Criminally Derived Property**, by knowingly engaging and attempting to engage in one or more monetary transactions by, through, and to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, that is, bank fraud, in violation of 18 U.S.C. § 1344, in violation of 18 U.S.C. § 1957(a).

Manner and Means

12. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

a. **ADEKOYA, BASSIE**, and others deposited and caused to be deposited bank fraud proceeds into bank accounts accessible to **ADEKOYA, BASSIE**, and other coconspirators. **ADEKOYA, BASSIE**, and others used cash bank fraud proceeds and bank fraud proceeds deposited into bank accounts accessible to **ADEKOYA, BASSIE**, and other coconspirators to purchase fake driver's licenses used to commit additional bank frauds and to purchase airfare, travel, and car rentals used to commit additional bank frauds.

b. **ADEKOYA, BASSIE**, and others deposited and caused to be deposited bank fraud proceeds into accounts in other people's names but accessible to **ADEKOYA, BASSIE**, and other coconspirators with the intent to conceal and disguise the nature, the location, the source, the ownership, and the control of the bank fraud proceeds.

c. **ADEKOYA, BASSIE**, and other coconspirators utilized and caused to be utilized peer-to-peer payment applications, including Zelle accounts, in the names of other people, to transfer bank fraud proceeds, with the intent to conceal and disguise the nature, the location, the source, the ownership, and the control of the bank fraud proceeds.

d. **BASSIE** and other coconspirators transported cash bank fraud proceeds across state lines and delivered the proceeds to **ADEKOYA**, with the intent to conceal and disguise the nature, the location, the source, the ownership, and the control of the bank fraud proceeds.

e. **ADEKOYA, BASSIE**, and other coconspirators deposited and caused to be deposited cash bank fraud proceeds and cashier's checks purchased with bank fraud proceeds in amounts greater than \$10,000 into bank accounts in other people's names.

All in violation of 18 U.S.C. § 1956(h).

COUNTS 3 through 11
[Aggravated Identity Theft]

13. Paragraphs 1 through 12 are hereby realleged and incorporated as if fully set forth herein.

14. On or about the dates specified below, in the Northern District of New York, and elsewhere, the defendants, **OLUWASEUN ADEKOYA, a/k/a “Ace G.,” a/k/a “BRODA,” a/k/a “SANTA,” a/k/a “SANTANA,” a/k/a “Sammy LaBanco,” a/k/a “Sean Maison,” a/k/a “Kiing_maison,” KANI BASSIE, a/k/a “\$,” JERMON BROOKS, a/k/a “JayB,” a/k/a “beezy,” CHRISTIAN QUIVERS, a/k/a “Denzel Carter,” a/k/a “E,” and CRYSTAL KURSCHNER**, during and in relation to a felony violation contained in Chapter 63 of Title 18 of the United States Code, that is a violation of Title 18, United States Code, Sections 1349 and 1344 (conspiracy to commit bank fraud), knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, and aided and abetted others in the transfer, possession, and use, without lawful authority, of a means of identification of another person, that is, the following names used to impersonate people at financial institutions at the following branch locations during and in relation to the bank fraud conspiracy charged in Count 1:

Count	Defendant(s)	Approximate Date	Location of Impersonation	Means of Identification
3	ADEKOYA	May 7, 2022	CAP COM Federal Credit Union Albany, New York	<u>Name:</u> S.A.
4	ADEKOYA	May 18, 2022	Sunmark Credit Union Latham, New York	<u>Name:</u> M.M.
5	ADEKOYA	May 18, 2022	Sunmark Credit Union Latham, New York	<u>Name:</u> R.C.
6	ADEKOYA	May 19, 2022	CAP COM Federal Credit Union Albany, New York	<u>Name:</u> J.G.
7	ADEKOYA	May 19, 2022	CAP COM Federal Credit Union Cohoes, New York	<u>Name:</u> K.W.
8	ADEKOYA	February 1, 2023	UFirst Federal Credit Union Rouses Point, New York	<u>Name:</u> K.F.
9	ADEKOYA, BASSIE, BROOKS, and QUIVERS	April 11, 2023	Truliant Federal Credit Union Damascus, Virginia	<u>Name:</u> A.H.
10	ADEKOYA	September 13, 2023	Grow Financial Federal Credit Union Summerville, South Carolina	<u>Name:</u> B.M.
11	ADEKOYA, BASSIE, and KURSCHNER	November 9, 2023	First Heritage Federal Credit Union Southport, New York	<u>Name:</u> J.C.

all in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FIRST FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2).

Upon conviction of conspiracy to commit bank fraud, as charged in Count One of the Indictment, in violation of Title 18, United States Code, Sections 1349 and 1344, the defendants, **OLUWASEUN ADEKOYA, a/k/a “Ace G.,” a/k/a “BRODA,” a/k/a “SANTA,” a/k/a “SANTANA,” a/k/a “Sammy LaBanco,” a/k/a “Sean Maison,” a/k/a “Kiing_maison,” KANI BASSIE, a/k/a “\$,” JERMON BROOKS, a/k/a “JayB,” a/k/a “beezy,” CHRISTIAN QUIVERS, a/k/a “Denzel Carter,” a/k/a “E,” and CRYSTAL KURSCHNER** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, and derived from, proceeds obtained directly and indirectly, as the result of such violations. The property to be forfeited includes, but is not limited to, the following:

- a. All cash seized on May 19, 2022 from a 2016 Nissan Rogue, New York License Plate xxxxx67, totaling approximately \$10,000.00;
- b. All cash seized on October 27, 2022 from a 2022 Toyota RAV4, Florida License Plate xxxx72, totaling approximately \$9,512.67; and
- c. A money judgment in an amount to be determined.

SECOND FORFEITURE ALLEGATION

The allegations contained in Count Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

Upon conviction of conspiracy to commit money laundering, as charged in Count Two of the Indictment, in violation of Title 18, United States Code, Section 1956(h), the defendants, **OLUWASEUN ADEKOYA, a/k/a “Ace G.,” a/k/a “BRODA,” a/k/a “SANTA,” a/k/a “SANTANA,” a/k/a “Sammy LaBanco,” a/k/a “Sean Maison,” a/k/a “Kiing_maison,”** and **KANI BASSIE, a/k/a “\$,”** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real and personal, involved in such offense, and any property traceable thereto, including, but not limited to, a money judgment.

Substitute Assets

If any of the property described above in either the First or Second Forfeiture Allegation, as a result of any act or omission of a defendant:

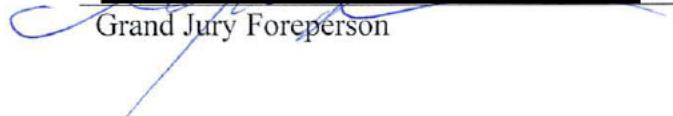
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: March 11, 2025

A TRUE BILL, *Name Redacted

[Redacted]

 Grand Jury Foreperson

DANIEL HANLON
Acting United States Attorney

By: /s/ Benjamin S. Clark
Benjamin S. Clark
Assistant United States Attorney
Bar Roll No. 703519